

## ***Statement***

### ***Insurance Association of Connecticut***

Judiciary Committee

March 20, 2009

#### **SB 1090, An Act Concerning The Collection And Disclosure Of Social Security Numbers**

The Insurance Association of Connecticut has concerns with SB 1090, An Act Concerning The Collection And Disclosure Of Social Security Numbers, in that it appears to confer authority for any violation of sections 42-471 to the Department of Consumer Protection.

The insurance industry is subject to the provisions of 42-471. The insurance industry is licensed and regulated by the Department of Insurance. As such, if an insurer violates any of the provisions of those statutes, or any law, it is already subject to the authority of the Insurance Department. It would appear that section 2 of SB 1090 may cause an insurer to be subject to dual and potentially conflicting regulatory authority. The current language of subdivision (d) of 42-471 specifically confers enforcement authority to Department of Consumer Protection only in those circumstances when the alleged violator is an entity that is not licensed by any other state agency. Removing that provision will result in subjecting entities to dual and potentially conflicting regulatory authority.

For the above stated reasons, the IAC respectfully requests that section 2 of SB 1090 be amended to clarify that the authority being vested to the Department of Consumer Protection is only to those entities that are not regulated by any other state agency, as currently contained in section 42-471.